

SEP 24 2013



Public Disclosure Commission

**WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION
COMPLAINT FORM**

(See instructions on the last page.)

Description of Complaint

1. RESPONDENT:

Identify who you are filing a complaint against and provide all contact information you have for them. Give names and titles, if any, for individuals, and the full name of any organization. Please note that the PDC does not enforce federal campaign finance laws or local ordinances.

Example #1: Joe Public, Mayor of My Town,

123 Main Street, Your Town, State, Phone: 555-123-4567, Email: unknown

Example #2: The Political Action Group (instead of P.A.G.), 123 Main Street, Your Town, State,

Phone: 555-123-4567, Email: pag@pag.org

26th district legislative district republican committee 7261 SE Roper Ln Olalla, WA 98359 phone: unknown

26thldrepublicans@gmail.com

Patrick Pettyjohn, 26th LD Republican Committee Board Member, 7063 SE Kansas St, Port Orchard WA 98366

phone: (360)871-3651 email: unknown

2. ALLEGED VIOLATIONS:

Explain how and when you believe the people/entities you are filing a complaint against violated RCW 42.17/RCW 42.17A or Title 390 WAC. Be as detailed as possible about dates, times, places and acts. If you can, cite which specific laws or rules you believe were violated. Attach additional pages if needed. (Note that the RCW 42.17 citation applies to conduct before 2012 and the RCW 42.17A citation applies to conduct on or after January 1, 2012.)

All contributions made by a person or entity, either directly or indirectly, to a candidate, to a state official against whom recall charges have been filed, or to a political committee, are considered to be contributions from that person or entity to the candidate, state official, or political committee, as are contributions that are in any way earmarked or otherwise directed through an intermediary or conduit to the candidate, state official, or political committee. For the purposes of this section, "earmarked" means a designation, instruction, or encumbrance, whether direct or indirect, expressed or implied, or oral or written, that is intended to result in or does result in all or any part of a contribution being made to a certain candidate or state official. If a conduit or intermediary exercises any direction or control over the choice of the recipient candidate or state official, the contribution is considered to be by both the original contributor and the conduit or intermediary. RCW 42.17a.460

Respondent Patrick Pettyjohn exercises control over where funds to the 26th District Republican Committee will be designated to Candidate Janice Angel. It is clearly stated in letter that contributors "extra donations" will allow the 26th LD Republican board to give more money to Candidate Angel's campaign.

(1) An electioneering communication made by a person in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or their agents is a contribution to the candidate.

Letter sent to large money donors of the Janice Angel campaign stated that recipients could give money "past the state maximum" by donating to 26th LD republicans. Candidate Angel is currently endorsed by this LD committee and also a member as stated on her website.

(2) An electioneering communication made by a person in cooperation, consultation, or concert with, or at the request or suggestion of, a political committee or its agents is a contribution to the political committee.

(3) If an electioneering communication is not a contribution pursuant to subsection (1) or (2) of this section, the sponsor shall file an affidavit or declaration so stating at the time the sponsor is required to report the electioneering communication expense under RCW 42.17A.305.
42.17a.310

(b) No candidate may accept contributions from a county central committee or a legislative district committee during an election cycle that when combined with contributions from other county central committees or legislative district committees would in the aggregate exceed forty cents times the number of registered voters in the jurisdiction from which the candidate is elected. 42.17a.405

Although 26th Republicans has no limit to accepting donations they are part of the 38k limit (26th Id club + Kitsap Republicans + Gig Harbor Republicans + Pierce Republicans + South Kitsap Republican women club + Gig Harbor Republican club + Silverdale Republican women club) it is "implied" that with making an "extra unmarked donation" to their LD committee that more money could be given to candidate Janice Angel.

(kitsap patriots + Kitsap republican liberty caucus + Tacoma Narrows Tea Party-- unknown if included or not in 38k total)

No contribution shall be made and no expenditure shall be incurred, directly or indirectly, in a fictitious name, anonymously, or by one person through an agent, relative, or other person in such a manner as to conceal the identity of the source of the contribution or in any other manner so as to effect concealment.
42.17a.435

Per the 26th LD Republican club website, treasurer is listed as James Reardon and vice-treasurer is Bill Landahl. Although no address is listed on any 26th LD Republican club website, address listed on documentation and PDC records (7261 SE Roper Lane, Olalla, WA 98359) resolves to Juliana McMahan, current secretary for Kitsap Republicans. Per another address check, Juliana Mc Mahan shows as living at 12001 SE Roper Lane in Olalla, WA 98359.

Evidence and Witnesses

3. EVIDENCE:

List the documents or other evidence you have that support your complaint, if any, and attach copies to this form. If you do not have copies, provide any information you have about where you believe the documents or evidence can be found and how to obtain it. Attach additional pages if needed.

Example: Emails between Joe public and Candidate X, attached OR

Joe Public has emails from Candidate X which describe an illegal campaign donation, and Joe Public's phone number is 555-123-4567.

Primary evidence is written correspondence between respondent Patrick Pettyjohn to (unnamed large money donor to Candidate Janice Angel's campaign)

RECEIVED

SEP 24 2013

Public Disclosure Commission

26th Legislative District Republican Committee
7261 SE Roper Lane
Olalla, WA 98359

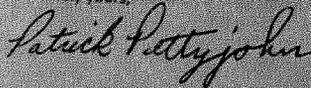
My Fellow Republicans:

I am writing to you because you are a big donor to Jan Angel's campaign for the 26th Legislative District Washington Senate position. I'd like to thank you for your donations and I have a way for you to give more than the state maximum. It is done by donating to our 26th Legislative District Republican Committee.

The 26th LD Republican Committee has no state law limit on how much you can give to it. It can then take your donation and give it to the candidate with a \$38,000 limit to each candidate as long as you don't earmark the donation since you have maxed out to the candidate's campaign. This extra donation will enable we, as board members, to give more money to Jan Angel's campaign. This is the pivotal campaign for the Republicans to take control of our WA Legislative body.

Some have given \$1,000 and more for this important race to the 26th LD Republican Committee. I urge you to also donate more for this great cause. Thank you for all that you do for the Republican Party.

Sincerely yours,



Patrick Pettyjohn
26th LD Republican Committee Board Member

4. WITNESSES:

List the names and contact information, if known, of any witnesses or other persons who have knowledge of facts that support your complaint. Attach additional pages if needed.

Example: Jane Public was present when Candidate X spoke to me about the illegal contribution. Jane Public's address is 123 Main Street, Your Town, USA 12345, and her phone number is 555-123-4567.

unknown at this time

none listed at this time

RECEIVED

SEP 24 2013

Public Disclosure Commission

Certification

In signing this complaint:

- I have provided all information, documents and other evidence of which I am aware;
- If I become aware of additional information, documents or evidence related to my complaint, I will promptly provide it to the PDC; and,
- I am providing the PDC current information on how to contact me, and will promptly update that information if it changes.

Your name (print or type) Johanna Baxter

Street address PO Box 4252

City, state and zip code South Colby, WA 98384

Telephone number (including area code) (360) 286-3334

E-mail address (optional) hannie@joesdiner.com

RECEIVED

SEP 24 2013

Public Disclosure Commission

Oath

Required for complaints against elected officials or candidates for elective office:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this complaint is complete, true and correct to the best of my knowledge and belief.*

Your signature _____

Date signed _____

Place signed (city and county)

City

County

Attachments

€ Check here if you are attaching copies of documentary evidence or extra pages explaining your complaint. (copy of letter attached)

**RCW 9A.72.040 says that "(1) A person is guilty of false swearing if he makes a false statement which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."*

**Washington State Public Disclosure Commission
Instructions for Filing a Formal Complaint**

✚ **When to use the formal complaint form:**

While this form is not required, its use is recommended when you want to file formal allegations of a violation of the Public Disclosure Commission (PDC) statutes or rules. You can find the PDC statutes and rules on the PDC website at www.pdc.wa.gov. If you have information or concerns about a possible violation but do not wish to file a complaint, please contact the PDC office directly.

✚ **How to submit your complaint form to the PDC:**

- Complete all sections. If you do not have some information, please write "unknown" instead of leaving a blank space.
- Attach copies of any evidence you have - we'll contact you if we need originals.
- Sign the oath if your complaint is against an elected official or a candidate for elective office.
- Mail, fax, or email your complaint and all attachments to the PDC.

✚ **If you have more questions:**

If you have more questions about filing a complaint, see the "Frequently Asked Questions about Filing a Complaint" guide available on the PDC's website at www.pdc.wa.gov under "Enforcement and Compliance." You may also contact the PDC directly.

PDC Contact Information

MAILING ADDRESS: Washington State Public Disclosure Commission
711 Capitol Way, Room 206
PO Box 40908
Olympia, WA 98504-0908

EMAIL ADDRESS: pdc@pdc.wa.gov

PHONE: 1-877-601-2828 (toll free)

FAX: (360) 753-1112

HOURS: Monday-Friday, 8:00 a.m. – 5:00 p.m., closed on state holidays.

RECEIVED

SEP 24 2013

Public Disclosure Commission